

KING & SPALDING

**MEMO ENDORSED**

King & Spalding LLP  
1185 Avenue of the Americas  
New York, NY 10036-4003  
Tel: +1 212 556 2100  
Fax: +1 212 556 2222  
www.kslaw.com

William F. Johnson  
Partner  
Direct Dial: +1 212 556 2125  
Direct Fax: +1 212 556 2222  
wjohnson@kslaw.com

August 22, 2014

Honorable Ronnie Abrams  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

USDC-SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 8/25/14

Re: United States v. Hixon, 14 Cr. 227 (RA)

Dear Judge Abrams:

On behalf of the defendant Frank Perkins Hixon, Jr., I respectfully write to request a temporary modification of the travel restrictions of Mr. Hixon's bail conditions for a trip to Austin, Texas from August 31, 2014 to September 3, 2014. The government has no objection to this request.

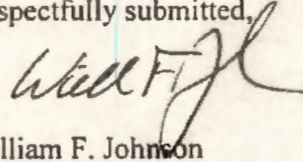
Mr. Hixon would like to travel to Austin, Texas to visit his younger daughter, be with her on her first day of the school year, and attend a birthday party scheduled to coincide with the beginning of school. He will leave New York City by plane on August 31, 2014 and return by plane on September 3, 2014.

Under the terms of Mr. Hixon's release, his travel is restricted to the Southern and Eastern Districts of New York. Accordingly, we respectfully request that the Court temporarily modify the travel restrictions of Mr. Hixon's bail conditions from August 31, 2014 to September 3, 2014, such that Mr. Hixon be permitted to travel by plane for the above-described trip to Austin, Texas. The Court has previously granted prior requests to modify Mr. Hixon's bail conditions to permit him to (i) travel to Massachusetts to pick up his older daughter from college (that trip occurred on May 16-18, 2014), (ii) travel to Austin, Texas to visit his younger daughter a total of four times from May to July (those trips occurred on May 21-25, 2014, June 4-7, 2014, June 16-17, 2014, and July 11-13, 2014), (iii) travel by automobile to Rhode Island with his wife

and younger daughter (that trip occurred on July 19-21, 2014), (iv) travel by plane to Austin, Texas to bring his daughter back home and then return to New York City (that trip occurred on July 24-26, 2014), and (v) travel to Austin, Texas to see his younger daughter on her birthday (that trip occurred on August 12-15, 2014).

I have conferred with AUSA Sarah McCallum, who has informed me that the government has no objection to this request. I have also attempted to contact U.S. Pretrial Services Officer Mildred Santana, but she is out of the office until September 2. Officer Santana has not objected to our prior requests for travel.

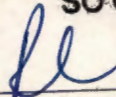
Respectfully submitted,



William F. Johnson

cc: AUSA Sarah E. McCallum  
U.S. Pretrial Services Officer Mildred Santana

APPLICATION GRANTED  
SO ORDERED

  
\_\_\_\_\_  
RONNIE ABRAMS, U.S.D.J.

8/22/14